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17 *Attorneys for Defendants*

18 UNITED STATES DISTRICT COURT
 19 NORTHERN DISTRICT OF CALIFORNIA
 20 SAN FRANCISCO DIVISION

21 REARDEN LLC et al.,
 Plaintiffs,

22 vs.

23 THE WALT DISNEY COMPANY et al.,
 Defendants,

24 REARDEN LLC et al.,
 Plaintiffs,

25 vs.

26 TWENTIETH CENTURY FOX FILM
 27 CORPORATION et al.,
 28 Defendants.

Case Nos. 3:17-cv-04006-JST
 3:17-cv-04191-JST

**DECLARATION OF PATRICK LEDDA
 IN SUPPORT OF MOTIONS FOR
 SUMMARY JUDGMENT ON CAUSAL
 NEXUS ISSUE**

Judge: Hon. Jon S. Tigar
 Date: To be set
 Time: To be set

Ctrm.: 9 (19th Floor)

I, Patrick Ledda hereby declare:

1. I am a visual effects supervisor, currently employed by MPC Film, a division of The Moving Picture Company, Ltd. ("MPC Film"). Except for those matters stated on information and belief, I have personal knowledge of the contents of this declaration. I am reliably informed of the matters stated on information and belief, and I believe such matters to be true. If called as a witness in this action, I could and would testify competently to the contents of this declaration.

2. I am informed and believe that Plaintiffs' claims in the above-captioned case relate to facial motion capture work in connection with *Fantastic Four*, specifically, in connection with the character "The Thing."

3. I was an employee of MPC Film and I was a visual effects supervisor for the motion picture *Fantastic Four* with respect to the shots that MPC Film was responsible for. In that role, I supervised the work that MPC Film performed for visual effects work in connection with *Fantastic Four*. Amongst other things, MPC Film was responsible for all of the shots in the film that included the character "The Thing."

4. I am informed and believe that the facial motion of "The Thing" character was not animated using data produced by MOVA Contour (such as a tracked mesh). I am informed and believe that the facial motions of the actor who portrayed "The Thing," Jamie Bell, were captured using MOVA Contour. However, because of the significant disparity between Mr. Bell's face and the face of "The Thing," those MOVA data files were not used to create the facial motions of "The Thing." I am informed and believe that, instead, the facial motion of "The Thing" was created by hand animation.

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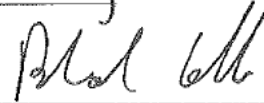
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5. To translate MOVA data files onto the facial model of "The Thing," my team would have needed to create an appropriate software script to further process the MOVA data

files. We decided not to even create this software script because the MOVA data from Jamie Bell's performance was too different from the facial motion of the model of "The Thing."

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that I executed this declaration this 26 day of February 2019 at

MPC London, UK.



Patrick Ledda